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**FILED**

**JUL 16 2018**

Clerk, U.S. District Court  
District Of Montana  
Helena

**ATTORNEYS FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION**

<b>UNITED STATES OF AMERICA,</b>  <b>Plaintiff,</b>  <b>vs.</b>  <b>ZACHARY DANIEL FLANAGAN,</b>  <b>Defendant.</b>	<b>CR 18- -BU-DLC</b>  <b>INFORMATION</b>  <b>FALSE STATEMENTS</b> <b>Title 18 U.S.C. § 1001(a)(2)</b> <b>(Penalty: Five years imprisonment,</b> <b>\$250,000 fine, and three years supervised</b> <b>release)</b>
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**THE UNITED STATES ATTORNEY CHARGES:**

Beginning in or about November 2013 until December 2013, in Bozeman in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, ZACHARY DANIEL FLANAGAN, did knowingly and willfully make

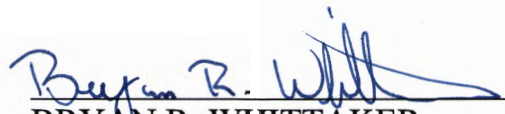
a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States—the City of Bozeman’s Publicly Owned Treatment Works (“POTW”), a local governmental entity authorized by the United States Environmental Protection Agency to administer a pretreatment program under the Clean Water Act.


Specifically, the above referenced defendant falsely stated and represented in an email to the POTW coordinator that “our lab results were analyzed by Scott Rogers and he said the waste water would be fine to send down the sewer.” The statement and representation was false, because, as the defendant then and there knew the environmental consultant, Scott Rogers, had not reviewed the lab results of the waste water and concluded that the waste water was suitable for discharge to the POTW.

In violation of 18 U.S.C. § 1001(a)(2).

DATED this 16th day of July, 2018.

KURT G. ALME  
United States Attorney

  
BRYAN R. WHITTAKER  
Assistant United States Attorney

  
for JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney  
Attorneys for Plaintiff